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June 10, 2004

Ms. Jean Webb, Secretariat
Commodity Futures Trading Commission
Three Lafayette Center
1155 21ST Street, N.W.
Washington, D.C. 20581

Dear Ms. Adriance:

I am writing in connection with the merger of the Coffee, Sugar & Cocoa Exchange, Inc. ("CSCE") and the New York Cotton Exchange ("NYCE") with and into the Board of Trade of the City of New York, Inc. ("NYBOT") on June 10, 2004 (the "Merger"), and the designation of NYBOT as a contract market under the Commodity Exchange Act, as amended (the "Act"). Specifically, NYBOT hereby confirms the following:

- (1) The Merger was completed on the date hereof;
- (2) The By-Laws and Rules of NYBOT submitted to the Commission in connection with the Merger were made effective by NYBOT on June 10, 2004 in its capacity as a designated contract market; and
- (3) NYBOT, in its capacity as a designated contract market, hereby confirms the representations made by it to the Commission in the letter dated May 20, 2004, filed in connection with the Merger.

In addition, NYBOT hereby submits, pursuant to Regulations 40.2 and 40.6 under the Act, those of its Rules that previously were submitted by CSCE and/or NYCE pursuant to the certification procedures of Regulations 40.2 and 40.6, and certifies that all such Rules comply with the Act and the regulations thereunder. NYBOT also confirms that it will maintain the certification conditions under which the original certifications were made by CSCE and/or NYCE and that it has not made material changes to the substance of those Rules. However, nothing contained herein shall be construed to preclude NYBOT from amending any such Rules.

Board of Trade of the City of New York, Inc.

By: _____
President & CEO

Cc: Riva Adriance, Esq.